

July 23, 2004

Ms. Anna Filutowski
United States Environmental Protection Agency Region 10
1200 Sixth Avenue, WCM-126
Seattle, Washington 98101-3188

RE: COMMENTS ON THE MAY 14, 2004 *PHASE II TRANSFORMER PCB INVESTIGATION WORK PLAN, BOEING PLANT 2, SEATTLE/TUKWILA, WASHINGTON*
FARALLON PN: 831-003

Dear Ms. Filutowski:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter on behalf of Earle M. Jorgenson Company (EMJ) to provide comments on the *Phase II Transformer PCB Investigation Work Plan, Boeing Plant 2, Seattle/Tukwila, Washington* (Work Plan) prepared by Weston Solutions, Inc. (Weston) for The Boeing Company (Boeing), dated May 14, 2004. The stated purpose of the Work Plan is to establish the extent of a polychlorinated biphenyl (PCB) release associated with the Seattle City Light (formerly Puget Power) transformers formerly located in the southern part of the Boeing Plant 2 facility. According to the Work Plan, the transformers were permanently removed from the Boeing Plant 2 facility in March and April 2004.

The Work Plan was prepared in response to comments provided by the United States Environmental Protection Agency Region 10 (EPA) to address data gaps identified in the *Phase I Transformer PCB Investigation Report*, prepared by Floyd Snider McCarthy, dated May 2004, and to fulfill the objectives of the *Transformer PCB Investigation Work Plan* prepared by Weston Solutions, Inc., dated February 2003.

In general, Farallon objects to any reference in Boeing's Work Plan that suggests that the Jorgensen Forge facility is, or was, a source of PCBs. PCBs have not been detected above the laboratory practical quantitation limit (PQL) and/or the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels in any of the soil and groundwater samples collected at the Jorgensen Forge facility.

The following comments address specific references in the Work Plan. The references in the Work Plan are defined by each section.

Section 2.1.2.2, 2nd Paragraph

This section is confusing and misleading and should be simplified. There are no existing data to support comments on "hot spot" or release timelines.



Outfall 9/9a has not been cleaned and may still be acting as a pathway for PCBs to sediments in the Duwamish.

Section 2.1.3.2.1, Last Paragraph

The relationship between stormwater outfalls located on the Jorgensen Forge property and PCB concentrations detected in sediments in the Duwamish has not been established. There is no evidence that the Jorgensen Forge property was, or is, a source of PCBs. As discussed in the *Revised Environmental Sampling Work Plan*, prepared by Farallon, dated May 12, 2004, a total of 69 soil samples have been collected and analyzed for PCBs from the Jorgensen Forge facility. The soil samples were collected in 1992, 1995, and June 2003 at depths ranging from approximately 2 to 12 feet below ground surface from the northern portion of the Jorgensen Forge facility. The analytical results for the soil samples collected on the Jorgensen Forge facility did not detect concentrations of PCBs above the laboratory PQL and/or the MTCA Method A cleanup level.

A total of 23 groundwater samples were collected in 1993, January 1996, and April, and June 2003, and analyzed for PCBs from the Jorgensen Forge facility. The groundwater samples were collected from monitoring wells located throughout the Jorgensen Forge facility, including monitoring wells located down-gradient of the electrical substation on the southeastern portion of the Jorgensen Forge facility, and the former transformers located on Boeing Plant 2 facility. The analytical results of groundwater samples did not detect concentrations of PCBs above the laboratory PQL and/or the MTCA Method A cleanup level.

These data confirm that there is no source of PCBs at the Jorgensen Forge facility. All references or claims to any releases from the Jorgensen Forge facility are speculative and should be removed from the Work Plan. As Weston summarized in the Work Plan, there are data that confirm that a release of PCBs to soil and groundwater has occurred in the vicinity of the former transformers located on the Boeing Plant 2 facility.

Section 4.2.3

Either one or both (if installed) of the proposed monitoring wells to be installed on the Jorgensen Forge facility should be included in the 72-hour transducer study to better define the groundwater potentiometric surface between Boeing Plant 2 and the Jorgensen Forge facility.

Section 4.2.5, 2nd Paragraph

Remove all references to "Jorgensen Investigation Area." No Jorgensen Investigation Area has been agreed to by EPA or Jorgensen Forge.



Section 4.2.6

Jorgensen Forge has granted Boeing access to the Jorgensen Forge property to allow Boeing to delineate the extent of chlorinated solvents and/or PCBs that have been released on Boeing Plant 2 and have migrated onto the Jorgensen Forge property. Jorgensen Forge will continue to allow access with the understanding that Boeing will adhere to the terms of the *License Agreement* between Jorgensen Forge and Boeing.

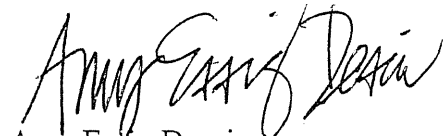
Figure 4

This figure is misleading and should be removed. A credible assessment of PCBs would separate subsurface data from surface data. All references to "Jorgensen Investigation Area" are inappropriate and should be removed.

Farallon appreciates the opportunity to provide comments on the Work Plan. Please contact the undersigned if you have any questions or require additional information regarding these comments.

Sincerely,

Farallon Consulting, L.L.C.


Amy Essig Desai
Task Manager


Peter Jewett
Project Manager

cc: William Johnson, EMJ
Tod Gold, Salter Joyce Ziker, P.L.L.C.
Ron Altier, Jorgensen Forge Corporation
David Templeton, Anchor Environmental, L.L.C.
Kim Johannessen, Johannessen & Associates

AED/PJ: syh